

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

BRIAN KAREM,

Plaintiff,

v.

DONALD J. TRUMP, in his individual capacity and
official capacity as President of the United States; and
STEPHANIE GRISHAM, in her individual capacity
and official capacity as White House Press Secretary,

Defendants.

Case No. 1:19-cv-2514-KBJ

DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION

The official and individual capacity defendants (“Defendants”), through their undersigned counsel, respectfully move unopposed to extend the time to Answer or otherwise respond to Plaintiff’s Complaint. Defendants ask that the Court extend the time to respond until 45 days after the Court rules upon the parties’ Joint Motion to Stay, ECF No. 37, in the event that the Court denies the Joint Motion. This request is made in good faith and with good cause, as set forth below:

1. On September 3, 2019, this Court granted Plaintiff’s motion for a preliminary injunction. ECF Nos. 33, 34. The official-capacity defendants appealed this decision on September 27, 2019. ECF No. 36.

2. Pursuant to the Court’s direction, the parties have met and conferred, and have jointly moved that this Court stay all proceedings in this action pending the official-capacity defendants’ appeal. ECF No. 37.

3. The official-capacity defendants' deadline to Answer or otherwise respond to the Complaint is on October 28, 2019. The individual-capacity defendants' deadline to Answer or otherwise respond to the Complaint is on November 4, 2019.

4. This request is not for purposes of delay, but rather is to provide this Court time to rule on the parties' Joint Motion to Stay, as well as to provide the Defendants time to prepare and review their responsive pleadings in the event that the Court denies the Joint Motion. Accordingly, Defendants respectfully request that this Court extend the deadlines for Defendants to respond to the Complaint until 45 days after this Court rules upon the parties' Joint Motion. In the event that the Court grants the Joint Motion, this motion for an extension would be moot.

5. Pursuant to LCvR 7(m), Plaintiff does not oppose this motion.

Dated: October 23, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

JAMES M. BURNHAM
Deputy Assistant Attorney General

ERIC R. WOMACK
Assistant Director

By: /s/ Joseph E. Borson
JOSEPH E. BORSON (Va. Bar No. 85519)
Trial Attorney, U.S. Dept. of Justice
Civil Division, Federal Programs Branch
1100 L St., NW
Washington, D.C. 20005
Tel: (202) 514-1944
Joseph.Borson@usdoj.gov

Counsel for Defendants in their official capacities

/s/ Paul E. Werner

Paul E. Werner (MD Bar, under LCvR
83.2(e))

Senior Trial Attorney

United States Department of Justice

Torts Branch, Civil Division

P.O. Box 7146, Ben Franklin Station

Washington, D.C. 20044

Tel: (202) 616-4152

Paul.Werner@usdoj.gov

*Counsel for Defendants in their individual
capacities*

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[PROPOSED] ORDER

For good cause shown, it is ORDERED that Defendants' deadline to answer or otherwise respond to Plaintiff's complaint is extended until 45 days after this Court rules upon the parties' Joint Motion to Stay.

DATE: _____

HON. KETANJI BROWN JACKSON
UNITED STATES DISTRICT JUDGE